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## MEMO ENDORSED

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July 14, 2021

### Via ECF

The Honorable Barbara Moses, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street,  
New York, NY 10007

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Re: *De La Cruz v. Manhattan Parking Group LLC, et al.*  
Case No. 20-CV-00977

Dear Judge Moses,

We are counsel to Plaintiff and write, jointly with counsel to Defendants, to respectfully request (i) an adjournment of the conference scheduled for July 22, 2021, and (ii) an extension of the deadline to file the pre-conference submission (currently due 3 days prior to the conference on July 19, 2021). The reason for the adjournment request is that Defendants' counsel has a conflict with the scheduled hearing date due to a JAMS mediation for another matter that has been scheduled since April. The parties have conferred and propose August 6, 2021 or August 12, 2021 (2pm or later) as alternate hearing dates, subject to the Court's availability.

The parties further request that the date by which to file the pre-conference submission be extended to a date three days prior to the rescheduled hearing date. The brief extension will provide the parties sufficient time to confer amongst themselves, with their respective clients and with the proposed administrator, in order to provide the most complete responses to the concerns raised in the Court's Order at Dkt. 64.

There have been no previous requests for adjournment or extension, and all parties consent to the request. This request for adjournment and extension will not affect any other scheduled dates or deadlines.

We thank the Court for its consideration.

Respectfully submitted,

/s/ C.K. Lee

C.K. Lee, Esq.

Application GRANTED. The July 22, 2021 conference is adjourned to **August 6, 2021 at 11:00 a.m.** In advance of the conference, and no later **August 3, 2021**, the parties shall file a joint letter addressing the topics in the Court's Order at Dkt. No. 64. SO ORDERED.



Barbara Moses  
United States Magistrate Judge  
July 15, 2021